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	:
UNITED STATES OF AMERICA	:
	:
	Case No. 16-cr-00776 (VEC)
v.	:
	:
ALAIN KALOYEROS, et al.,	:
	:
Defendants.	:
	:
	<b>DECLARATION OF</b>
	<b>MICHAEL C. MILLER</b>
	<b>IN SUPPORT OF</b>
	<b>MOTION TO DISMISS UNDER</b>
	<b>FEDERAL RULE OF CRIMINAL</b>
	<b>PROCEDURE 12</b>
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1. I am a partner at Steptoe & Johnson LLP, located at 1114 Avenue of the Americas, New York, NY 10036.
2. I am counsel for Defendant Alain Kaloyeros in the above-captioned matter.
3. Attached as Exhibit A is a true and correct copy of an October 1, 2013 Fort Schuyler Management Corporation Request for Proposal for a Strategic Research, Technology Outreach, Business Development, Manufacturing, and Education and Training Partnership with a Qualified Local Developer in the Greater Syracuse Area, obtained from <http://www.ftsmc.org/s/RFP-for-Strategic-Developer-Partnership-in-the-Greater-Syracuse-Area-9-1.pdf>.
4. Attached as Exhibit B is a true and correct copy of an October 15, 2013 Fort Schuyler Management Corporation Request for Proposal for a Strategic Research, Technology Outreach, Business Development, Manufacturing, and Education and Training Partnership with a Qualified Local Developer in the Greater Buffalo Area, obtained from <http://www.ftsmc.org/s/RFP-Greater-Buffalo.pdf>.
5. Attached as Exhibit C is a true and correct copy of a May 29, 2013 email exchange between Alain Kaloyeros, John Loonan of Fuller Road Management Corporation, and Dean Fuleihan of Fort Schuyler Management Corporation.
6. Attached as Exhibit D is a true and correct copy of a July 5, 2013 Letter from Jessica Gabriel of the Empire State Development Corporation to Scott Bateman of Fuller Road Management Corporation.

I declare under penalty of perjury that the foregoing statements are true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: New York, New York  
May 19, 2017

/s/Michael C. Miller  
Michael C. Miller